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Attorneys for Ke Kailani Partners, LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X		
In re:	:	Chapter 11
	:	
KE KAILANI DEVELOPMENT, LLC, ¹	:	Case No. 17-22662 (RDD)
	:	
Debtor.	:	
-----X		

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that, the undersigned, as counsel for Ke Kailani Partners, LLC, hereby enters its appearance in the above-captioned chapter 11 case pursuant to Rules 2002, 3017, 9010 and 9007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) requests that copies of all notices and papers served or required to be served in this case be given and served upon the following, and that Dechert LLP be added to the mailing matrix on file with the Clerk

¹ Upon information and belief the last four digits of the Debtor’s tax identification numbers are (6745).

of the Bankruptcy Court, as follows:

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PLEASE TAKE FURTHER NOTICE that, the foregoing request includes the notices and papers referred to in the Bankruptcy Rules and also includes, without limitation, any plan of reorganization and objections thereto, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other documents brought before this Court with respect to this case and any related proceedings, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, personal delivery, telephone, telegraph, telex, facsimile, electronic mail or otherwise.

PLEASE TAKE FURTHER NOTICE that, neither this notice of appearance nor any prior or later appearance, pleading, claim or suit shall waive any right of Ke Kailani Partners, LLC (1) to have an Article III judge adjudicate in the first instance any case, proceeding, matter, or controversy as to which a bankruptcy judge may not enter a final order or judgment consistent with Article III of the United States Constitution; (2) to have final orders in non-core matters entered only after de novo review by a United States District Court judge, (3) to trial by jury in any case, matter, proceeding, or controversy so triable, (4) to have the reference

withdrawn by the United States District Court in any case, proceeding, matter, or controversy subject to mandatory or discretionary withdrawal, or (5) any other rights, claims, actions, defenses, setoffs or recoupments, to each Ke Kailani Partners, LLC is or may be entitled under agreements, in law, in equity or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: New York, New York
May 4, 2017

DECHERT LLP

By: /s/ Shmuel Vasser
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